

United States District Court

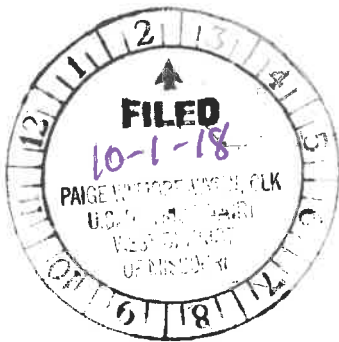
WESTERN DISTRICT OF MISSOURI
WESTERN DIVISION

SEALED

UNITED STATES OF AMERICA

v.

JAMES SAMUELS
[DOB: 10/15/1965]



COUNT ONE:

Sale of a Firearm and Ammunition to a Prohibited Person

18 U.S.C. §§ 922(d)(1) and 924(a)(2)

NMT: 10 Years' Imprisonment

NMT: \$250,000 Fine

NMT: 3 Years' Supervised Release

\$100 Mandatory Special Assessment

Class C Felony

COUNT TWO:

Knowing Transfer of a Firearm for Use in a Crime of Violence

18 U.S.C. § 924(h)

NMT: 10 Years' Imprisonment

NMT: \$250,000 Fine

NMT: 3 Years' Supervised Release

\$100 Mandatory Special Assessment

Class C Felony

CRIMINAL COMPLAINT

Case Number: 18-MJ-00143-LMC

I, the undersigned complainant being duly sworn, state the following is true and correct to the best of my knowledge and belief:

COUNT ONE

On or about September 5, 2018, in the Western District of Missouri, the defendant JAMES SAMUELS knowingly sold a firearm and ammunition, that is, an American Tactical Imports Omni-Hybrid AR-15 .223 caliber rifle, Serial Number NS179118, and four (4) boxes, each containing twenty (20) rounds of Wolf .223 caliber ammunition, to ATF Confidential Informant #1331, knowing and having reasonable cause to believe that ATF Confidential Informant #1331 had been convicted of a crime punishable by imprisonment for a term exceeding one year, contrary to the provisions of Title 18, United States Code, Sections 922(d)(1) and 924(a)(2).

COUNT TWO

On or about September 5, 2018, in the Western District of Missouri, the defendant JAMES SAMUELS did knowingly transfer a firearm, that is, an American Tactical Imports Omni-Hybrid AR-15 .223 caliber rifle,

Serial Number NS179118, knowing that the firearm would be used in a crime of violence, contrary to the provisions of Title 18, United States Code, Section 924(h).

I further state that I am a Special Agent with the Bureau of Alcohol, Tobacco, Firearms and Explosives and that this complaint is based on the following facts:

(See attached Affidavit),

Continued on the attached sheet and made a part hereof: ☒ Yes ☐ No.



JEFFREY M. BROCK

Special Agent

Bureau of Alcohol, Tobacco, Firearms and Explosives

Sworn to before me and subscribed in my presence,

10/1/18

Date

at

Kansas City, Missouri

City and State

HONORABLE LAJUANA M. COUNTS

United States Magistrate Judge

Name and Title of Judicial Officer



Signature of Judicial Officer